

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	No. 4:14-CR-000152 RWS (NCC)
v.	)	No. 4:14-CR-000175 AGF (DDN)
	)	
CHARLES WOLFE,	)	
	)	
Defendant.	)	

**DEFENDANT CHARLES WOLFE'S**  
**MOTION TO MODIFY BAIL CONDITIONS TO PERMIT SPECIFIC TRAVEL**

NOW COMES the Defendant Charles Wolfe, by and through his attorneys, Lucco, Brown, Threlkeld and Dawson, LLP, and moves this Court to modify his conditions of bail to permit him to travel to the following places:

**March 12, 2017, Memphis, TN Metro Area**

1. Defendant has been on bail since June of 2014, he is not considered a flight risk.
2. Defendant has a need to travel for legitimate business reasons for the franchise group Vaporwize store located at 8095 Macon Rd., Cordova, TN 38018. Travel will be only on Sunday, March 12, 2017 with no overnight stay required.
3. Defendant will stop at 2-3 Vaporwize locations in the Memphis, TN metro area including the store located at 8095 Macon Rd., Cordova, TN 38018.

WHEREFORE, Defendant prays that his conditions of bail be modified so that he may travel to the aforementioned places.

Respectfully submitted,

/s/ Christopher P. Threlkeld  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was filed electronically with the United States District Court, Eastern District of Missouri, this 9<sup>th</sup> day of March, 2017.

/s/ Christopher P. Threlkeld